

working through settlement discussions and resolve this matter. Third-Party Defendants also require additional time to respond because Michael A. Padron is currently incarcerated and communication with him is limited. Mr. Padron is needed to assist in the preparation of arguments made by Third-Party Defendants.

4. Therefore, Third-Party Defendants ask the Court to grant an extension of thirty (30) days from the current deadline to allow the parties to continue their settlement discussions as well as communicating with Mr. Padron. The extension of time would make the response deadline October 15, 2023. Of note, the thirty (30) day deadline falls on October 14, 2023, which is a Saturday.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Third-Party Defendants request that this Motion be granted, and that the Court extend the deadline for Defendants to Respond to Third-Party Plaintiffs' Traditional and No-Evidence Motion for Summary Judgment as set forth above and grant them such further relief, in law or in equity, to which they may be entitled.

Respectfully submitted,

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GROUP, LLC**

CERTIFICATE OF CONFERENCE

On September 13, 2023, Third-Party Defendants' counsel conferred with Third-Party Plaintiffs' counsel on this issue. However, Third-Party Plaintiffs' counsel was opposed to the extension.



SCOTT M. NOEL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing *Third-Party Defendants' Opposed Motion for Extension of Time to Respond to Third-Party Plaintiff's No-Evidence and Traditional Motion for Summary Judgment* has been served by CM/ECF and/or by electronic mail upon the following counsel of record on September 13, 2023:

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